

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

\* \* \* \* \*  
RSUI INDEMNITY COMPANY,  
PLAINTIFF,  
vs. CIVIL ACTION NO:  
1:07cv893-LG-JMR  
NEW PALACE CASINO, LLC,  
DEFENDANTS.  
\* \* \* \* \*

The deposition of GEORGE CONWILL, was  
taken at the New Palace Casino  
Administrative Office, 231 5th Street,  
Biloxi, Mississippi, on the 21st day of May  
2009, commencing at approximately 2:00 p.m.



1 Q. And in the meetings prior to  
2 placing that, this is because you told Jack  
3 we want all perils covering up to X-amount  
4 of coverage for all properties?

5 A. Yes.

6 Q. Has New Palace ever considered  
7 bringing claims against Cobbs or Welbourn  
8 for not placing appropriate coverage over  
9 the properties?

10 A. Well, no. Are you asking should  
11 we? Pat? No. We have not. I -- you know,  
12 I want to add this. We believed that, you  
13 know, Jack and Cobbs Allen who represents us  
14 has shown every effort to try to give us the  
15 best deal possible and helped us in dealing  
16 with this claim so we believe that they've  
17 given us really good effort in trying to  
18 help us deal with this. I just wanted to  
19 put that on the record.

20 Q. Okay.

21 A. And also that, you know, Jeff  
22 Carmello and RSUI, you know, that they've  
23 done their work. We just disagree with  
24 their allocation of wind to flood and the  
25 way they interpret the policy, I guess. So

1 I'm just looking for my money.

2 Q. Who is Bruce Wood?

3 A. I think he works for Cobbs, Allen  
4 and Hall. I think he's a broker. I have  
5 met Bruce before.

6 Q. Does he work for Wood Special Risk  
7 Brokers?

8 A. Okay. Yes.

9 Q. Does that sound right?

10 A. Yes. That sounds right.

11 Q. So Bruce Wood is the broker that  
12 probably was contacted by Jack Welbourn of  
13 Cobbs to place coverage?

14 A. Some of our coverage?

15 Q. Yeah. Some of your coverage.

16 A. Oh, sure. I'm sure.

17 Q. And so Jim -- I'm sorry, Jack is  
18 more your agent than a broker?

19 A. I don't know that I look at it any  
20 differently. I mean --

21 MR. ZACHARY: We're gonna object to  
22 the extent it calls for a legal conclusion  
23 under Mississippi law.

24 You can answer it, if you can.

25 THE WITNESS: I've met Bruce. I